



KBK ENTERPRISES, INC.

A SUBSIDIARY OF JTM INDUSTRIES, INC.

1000 COBB PLACE BOULEVARD
BUILDING 400
KENNESAW, GEORGIA 30144
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FAX (404) 499-9219

DOGM
MINERALS PROGRAM
FILE COPY

January 7, 1992

RECEIVED

JAN 09 1992

DIVISION OF
OIL GAS & MINING

Mr. D. Wayne Hedberg
Permit Supervisor
Utah Department of Natural Resources
Division of Oil, Gas, and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Re: Response to Conditions of Approval of Permit Amendment,
Reclamation of Areas 1 & 2, Marblehead Mountain Lime
Facility, Material Energy Research and Recovery Corporation
(MERR), M/045/024, Tooele County, Utah

Dear Mr. Hedberg:

The revisions to the reclamation plan and requested laboratory analysis required to conform to the conditions of approval outlined in the State of Utah, Department of Natural Resources, Division of Oil, Gas and Mining's (the Division) December 3, 1991 approval letter have been made. All approval letter items requiring plan changes (items 1,2,5,6,7 and 8) have been made and will be carried out in the reclamation process (revised reclamation plan and drawings enclosed).

As directed by the Division, the kiln scale material was analyzed (letter item 3) for heavy metals by the Toxicity Characteristic Leaching Procedure (TCLP, EPA SW 846-1311) and acid base potential ("Guidelines for Management of Topsoil and



A Union Pacific Company

Overburden"; and EPA 600/2-78-054). Two "typical/representative" overburden and process waste material samples (letter item 4) were analyzed for heavy metals by TCLP (scale and waste analytical results are attached).

The overburden/process waste sample analyses were conducted as a precautionary measure in March 1991 in anticipation of the Division's request. This waste pile has been subsequently covered with two feet of cover material. By mutual agreement, the acid base potential analysis of this material was forgone due to the potential problems associated with disturbing the reclaimed waste pile for additional sampling.

If you have any questions about changes to the reclamation plan or the analyses conducted, do not hesitate to contact this office.

Sincerely,

KBK Enterprises, Inc.



Thomas C. Schmaltz, Ph.D.
Director of Environmental Permitting

TCS/das

cc: Danny Gray W/O Attachments
Charles McCormick W/O Attachments



AMERICAN
WEST
ANALYTICAL
LABORATORIES

INORGANIC ANALYSIS REPORT

Client: M.E.R.R. Corporation
Date Received: December 13, 1991
Lab Sample ID Number: 8522-01
Field Sample ID: Kiln #1 (scale)

Contact: Jack Minchey
Received By: Judi Layne

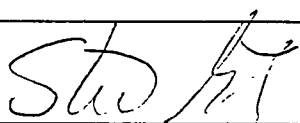
Analytical Results

463 West 3600 South
Salt Lake City, Utah
84115

(801) 263-8686
Fax (801) 263-8687

	<u>Method Used:</u>	<u>Detection Limit:</u> mg/L	<u>Amount Detected:</u> mg/L
TCLP METALS	1311		
Arsenic	7060	0.01	<0.01
Barium	6010	0.10	0.45
Cadmium	6010	0.005	<0.005
Chromium	6010	0.01	0.13
Copper	6010	0.10	<0.10
Lead	7421	0.01	0.09
Mercury	7471	0.001	<0.001
Selenium	7740	0.005	<0.005
Silver	6010	0.01	0.02
Zinc	6010	0.10	0.11

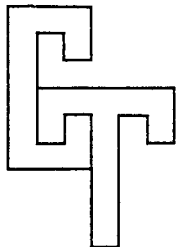
Released by:


Laboratory Supervisor

Report Date 12/20/91

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CHEMTECH

ANALYTICAL LABORATORY

6100 S. STRATLER
MURRAY, UTAH 84107
PHONE: (801) 262-7299
FAX: (801) 262-7378

DATE: 12-20-91

TO: American West
463 West 3600 South
Salt Lake City, Utah 84114

SAMPLE ID: Lab #U072055 - Sample 85221, 12-13-91

CERTIFICATE OF ANALYSIS

<u>PARAMETER</u>	<u>DETECTED</u>
Maximum Acid Potential, tons CaCO_3 /1000 tons soil	<.1
Neutralization Potential, tons CaCO_3 /1000 tons soil	309
Acid Base Potential, tons CaCO_3 /1000 tons soil	309


Rex Henderson



AMERICAN
WEST
ANALYTICAL
LABORATORIES

Client: Merr Corp.
Date Received: March 22, 1991
Lab Sample ID Number: 5500-02
Field Sample ID: Waste Pile - 3' Hole

Contact: Jack Minchey
Received By: Elona Hayward

INORGANIC ANALYSIS REPORT

Analytical Results

		<u>Method Used:</u>	<u>Detection Limit:</u> mg/L	<u>Amount Detected:</u> mg/L
463 West 3600 South Salt Lake City, Utah 84115 (801) 263-8686 Fax (801) 263-8687	TCLP METALS	1311		
	Arsenic	7060	0.01	<0.01
	Barium	6010	0.005	0.60
	Cadmium	6010	0.005	0.013
	Chromium	6010	0.01	0.08
	Copper	6010	0.005	2.6
	Lead	7421	0.01	<0.01
	Mercury	7471	0.001	<0.001
	Selenium	7740	0.005	<0.005
	Silver	6010	0.01	0.01
	Zinc	6010	0.01	0.04

Released by: *John C. Yamaguchi*
Laboratory Supervisor

Report Date 4/3/91

1 of 1



AMERICAN
WEST
ANALYTICAL
LABORATORIES

INORGANIC ANALYSIS REPORT

Client: Merr Corp.
Date Received: March 22, 1991
Lab Sample ID Number: 5500-01
Field Sample ID: Waste Pile Surface

Contact: Jack Minchey
Received By: Elona Hayward

Analytical Results

		<u>Method Used:</u>	<u>Detection Limit:</u> mg/L	<u>Amount Detected:</u> mg/L
463 West 3600 South Salt Lake City, Utah 84115 (801) 263-8686 Fax (801) 263-8687	TCLP METALS	1311		
	Arsenic	7060	0.01	<0.01
	Barium	6010	0.005	1.3
	Cadmium	6010	0.005	0.025
	Chromium	6010	0.01	2.6
	Copper	6010	0.005	4.5
	Lead	7421	0.01	<0.01
	Mercury	7471	0.001	<0.001
	Selenium	7740	0.005	<0.005
	Silver	6010	0.01	0.11
	Zinc	6010	0.01	0.07

Released by: 
Laboratory Supervisor

Report Date 4/3/91

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